



**State of New Jersey**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**DIVISION OF HAZARDOUS WASTE MANAGEMENT**

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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO. P905-518-063

Cristopher R. Anderson, Manager  
Environmental Affairs  
M.A. Hanna Company  
1301 E. Ninth St.  
Cleveland, OH 44114

01 NOV 1990

Dear Mr. Anderson:

Re: L.E. Carpenter Amended ACO 9/26/86  
USEPA II Comments on RI Report

The U.S. Environmental Protection Agency Region II has reviewed the RI Report and has transmitted to the Department the following comments that must be addressed in the supplemental work plan or the feasibility study.

1. According to the U.S. EPA's proposed Ground Water Classification Guidelines, ground water at this site is at least Class IIA, a current source of drinking water. Because of this classification, maximum contaminant levels (MCLs) are applicable or relevant and appropriate requirements (ARARs) for ground water at the site, and the 500 series methods of analysis should be used for determining volatile organic chemical (VOC) concentrations.
2. The Hydrogeologic Section should identify the aquifer(s) being tested.
3. A complete well survey of all potable wells within a two mile radius of the site should be implemented and the two indicated public supply wells should be identified as to ownership.
4. The potable wells that are cited in the RI must be tested for contaminants of concern.
5. It is indicated that three wells are actively recovering floating product from the east portion of the site. These extraction wells are designated as MW-6, MW-7 and MW-10. According to Figure 1, wells MW-6 through MW-10 are designated Groundwater Technology Monitor Wells. It should be clearly documented as to

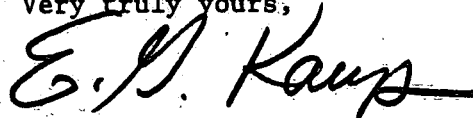


which wells are for extraction, and which are for monitoring purposes.

6. In Section 4.6.2, Groundwater Sampling, the RI should indicate where the purge volume was placed during well development. The proper disposal insures the integrity of the well.
7. Ground water elevations, for shallow wells, as indicated in Table(s) 30 and 31 were measured a few days apart during October, 1989. EPA recommends additional measurement during the time of the seasonally high water table in order to more accurately portray the ground water regime.
8. Page 81, 86. Airborne Contamination. There is concern that the potential for Airborne Chromium contamination may have been overlooked. The RI Report statement on page 86 that "chromium was not detected in any air sample" contradicts the air sampling results in Table 29. The statement must be corrected. Also, the phrase (page 81) "exceeding elevated ambient levels" requires an explanation since chromium was found in the air samples. Also, L.E. Carpenter must re-evaluate the potential risk of chromium since an EPA spot check of risk indicates  $2 \times 10^{-2}$  excess cancer deaths using the  $10.4 \text{ ug/m}^3$  data point from Table 29.

Should you have any questions, you may contact me at (609) 633-1455.

Very truly yours,



Edgar G. Kaup, P.E., Case Manager  
Bureau of Federal Case Management

kj

c: J. Josephs, USEPA II  
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